



H. MAX LUMMIS IV

Vice President/Chief Operating Officer
314-454-6406
Fax: 314-454-6404

Chairman Reed Hundt
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, N.W.
Washington, D.C. 20554

Dear Chairman Hundt:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station KPLR-TV in St. Louis, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rules has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on my station's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. With PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

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September 16, 1994
Chairman Reed Hundt
Page 2

Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such as my own deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Very truly yours,

A handwritten signature in black ink, appearing to read "H. Max Lummis, IV". The signature is stylized with a large "H" and a long, sweeping underline.

H. Max Lummis, IV
Vice President and
Chief Operating Officer

HML:11



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123
BUCK OWENS PRODUCTION COMPANY, INC.

September 12, 1994

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SEP 26 1994

FCC MAIL ROOM

KUZZ FM 107.9
Fax 805.328.7535

KUZZ TV 45
Fax 805.328.7576

KC&W AM 55
Fax 805.328.7535

KTIE FM 107.1
Fax 805.328.7535

HOME PREVIEW
MAGAZINE
Fax 805.328.7503

TARGET
PRINT & MAIL
Tel 805.325.3391

CAMERA ADS
CLASSIFIEDS
Tel 805.327.9803

KNIX FM 102.5
Phoenix, AZ

KC&W AM 1580
Phoenix, AZ

Roy Stewart
Federal Communications Commission
Office Of Mass Media
1919 M Street, NW
Room 314
Washington, DC 20554

Dear Mr. Stewart:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station KUZZ, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on my station's ability to finance programming for other dayparts, including local news and public affairs programming.

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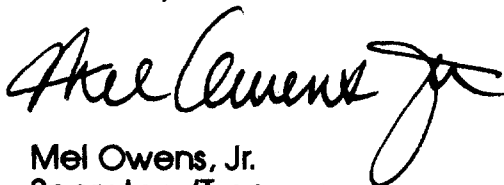
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BUCK OWENS PRODUCTION COMPANY, INC.

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Sincerely,

A handwritten signature in black ink, appearing to read "Mel Owens, Jr.", with a stylized flourish at the end.

Mel Owens, Jr.
Secretary/Treasurer

MO/cm



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133 DOCKET FILE COPY ORIGINAL

SEP 19 9 39 AM '94

September 12, 1994

RECEIVED

SEP 26 1994

FCC MAIL ROOM

Reed Hundt
Office of Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Chairman Hundt:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station KRLR-TV, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on my station's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

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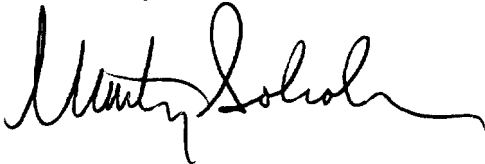
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page 2
FCC

deserve the chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Marty Sokoler", with a long horizontal flourish extending to the right.

Marty Sokoler
Vice President/General Manager
KRLR-TV Las Vegas 21

MS:aa

Suite 300
10 E. Cambridge
Circle Drive
Kansas City
Kansas 66103

913.621.6262

facsimile
913.621.4703

KSMO TV 62

September 12, 1994

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FCC MAIL ROOM

Mr. Reed Hundt
Office of Chairman, Rm. 814
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Mr. Hundt:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station, KSMO-TV62, strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

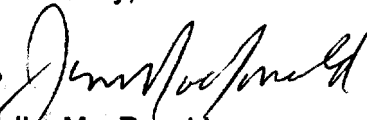

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on KSMO-TV62's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

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Sincerely,


Jim MacDonald
V.P./General Manager

HOME OF THE **Royals**
JM/cn

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